



# Summary of Public Comment



April, 2010

## USDA Forest Service

### National Forest System Land Management Planning:

### Notice of Intent to Prepare an Environmental Impact Statement

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# Summary of Public Comment

## Introduction

This document is a summary of public comment for the National Forest System Land Management Planning Notice of Intent to Prepare an Environmental Impact Statement (FSPR NOI). The formal comment period on the FSPR NOI began on December 18, 2009, and ended February 16, 2010. The Forest Service received 26,155 responses, consisting of 683 substantive original responses and 25,472 form letters.

This document provides a project background on the FSPR NOI, follows with a short description of the content analysis process, and concludes with an overview of the main areas of public concern. This summary does not provide an exhaustive account of public comments or concerns. The comments on the FSPR NOI are varied and contain substantial specificity and detail. In fact, the database contains over 4,500 individual comments. As a result, this summary provides only a general discussion of pervasive themes running through the comments, and serves as a roadmap to the various thematic areas of comment received on the project.

Reviewers should be aware that respondents are self-selected, and their comments do not necessarily represent the views of the public at large. In considering these views, it is important for the public and decision makers to understand that this process makes no attempt to treat input as if it were a vote. Instead, the content analysis process ensures that every comment is considered at some point in the decision process.

## Project Background

In December 2009, the Forest Service published a NOI to prepare an Environmental Impact Statement (EIS) documenting the effects of a new planning rule to guide land managers in developing, amending, and revising land management plans for the 155 national forests and 20 grasslands in the National Forest System (NFS). The new planning rule would consider opportunities to protect, reconnect, and restore national forests and national grasslands for the benefit of human communities and natural resources, while complying with requirements under the National Forest Management Act of 1976 (NFMA), the Multiple-Use Sustained-Yield Act of 1960 (MUSYA), the Endangered Species Act (ESA), the Wilderness Act of 1964, and other legal requirements.

In recent years, several planning rules have been promulgated. The 1982 rule was removed from the CFR and replaced by the 2000 rule, (a process that has prevented the agency from being able to simply reinstate the 1982 rule). However, the 2000 rule contains transition provisions which permit the use of 1982 rule provisions. No national forest or grassland has ever used the 2000 rule to amend or revise a plan because of its complexity. The 2000 rule had been replaced by the 2008 planning rule, which was subsequently held invalid by a Federal District Court. The Forest Service will employ the 2000 rule in the interim for revisions and amendments of plans, and expects (based on experience) that forests and grasslands will use the 1982 rule provisions, as permitted by the transition provisions of the 2000 rule.

## **Content Analysis Process**

Content analysis is a method of evaluating public comments in order to derive information and summarize themes and common concerns. While this summary does not seek to capture every specific concern, it strives to identify key issues and themes for decisionmakers and the public. This process and the resulting analysis do not replace comments in their original form. The planning team and the public are encouraged to review the actual letters firsthand.

Each response is given a unique identifying number, allowing analysts to link specific comments to original letters. Respondents' names and addresses are entered into a project-specific database program, enabling creation of a complete mailing list of all respondents that provided substantive input. The database is also used to track demographic information such as responses from special interest groups or federal, state, tribal, county, and local governments. All input is considered and reviewed by analysts. Each response is read and sorted into comments addressing various concerns and themes. This sorting is accomplished by applying "codes" to each comment. Comments are then entered into the database.

In preparing the final summary analysis, public issues are reviewed using database reports and searches. Analysts track coded input and strive to identify all relevant issues and concerns, not just those represented by the majority of respondents. Content analysis is intended to facilitate good decision-making by helping the planning team to clarify, adjust, or incorporate technical information into preparation of planning documents and rules. All responses (i.e., public hearing transcripts, letters, emails, faxes, and other types of input) are included in this analysis.

Because of the specific and technical nature of questions asked in the NOI and the resulting specificity of public comments, all parties using this summary are strongly encouraged to review the original comments as well. This analysis does not replace the comments individually, but gives insight into the comments collectively.

## Overview of Comments

Public comment on the FSPR NOI is far-reaching, highly detailed, and represents a wide range of values and perspectives with respect to the agency's planning direction.

Because of the very large number of substantive comments received, a wide range of values and perspectives have resulted, and only broad generalizations or key themes are targeted in this summary. The following subsections describe the public comments received in relation to the major action themes of the FSPR NOI.

### General Comments

Many commenters provided statements of general support, often including a rationale for their position. Usually, these comments don't support a particular approach to planning, but rather support a rule that ensures environmental or ecological protections. Some respondents don't want to see professional foresters and engineers replaced with a Committee of Scientists or other outside advisory bodies. Many emphasize the need for sound science in forest planning processes and decisions. For example:

337.1: "I urge you to develop a forest planning rule that protects and restores the water, wildlife, recreational opportunities, and other natural resources of the National Forest System. The planning rule must be rooted in sound science, ensure broad public participation in forest planning, and squarely address new threats created by climate change."

Others oppose fundamentally changing the forest management approach, but advocate updating or adjusting the current planning rules. Many opposing comments provide specific criticism of the assumptions (e.g., climate change/species diversity) that are assumed to be central to the proposed forest planning principles. For example:

42.1: "I feel that the best action to be taken is the 'no-action' alternative. Adjustments can be made to the current planning rules without further bankrupting our nation via terribly expensive EIS studies. I feel terribly uncomfortable with many of the politically motivated points of concern that suggested we must have an entirely new planning rule. I do not trust the Forest Service/Department of Interior to do what is right for our forests and public lands primarily because of the favoritism that they must show to those who appointed them to their positions. I ask that no-action be taken to further this agenda."

Among those who support or oppose specific or general management approaches, many state a common feeling to the effect that the outcome should "leave our forests alone" or keep things the way they are.

Several commenters provide general discussions of the roles they think the Forest Service should focus on, such as protecting water (watersheds), wildlife resources, and plant populations. Many commented on the need to preserve forests for future generations. Respondents discussed the idea that an increase in population will result in the need to increase the amount of public lands available for various types of use and recreation. Others used the same rationale to emphasize the need for greater and more stringent protection. Many stated the Forest Service should not cater to private or commercial

interests, while others felt that forests should be managed for multiple-use that includes responsible interfaces with industry.

Some commenters believe that intensive types of forest management are not necessary, stating that forests regenerate themselves without human micro-management or special interest group involvement. Other commenters discussed the need for better land management plans that have a strong orientation toward restoration and conservation. One commenter states:

109.1: “We [Association of Fish and Wildlife Agencies] support the proposed principles for guiding the development of a new planning rule. Specifically, land management plans should address the need for restoration and conservation to enhance the resilience of ecosystems to a variety of threats (e.g., climate change, alterations of natural fire regimes, changing water conditions, aggressive insects, disease, and invasive species); and to climate change through monitoring, mitigation and adaptation, maintenance and restoration of watershed health, and ensuring the diversity of species and wildlife habitat.”

## **Analysis**

A wide variety of comments relating to analysis were submitted. Generally speaking, a major theme was the role of science in decisionmaking, with many commenters discussing the concept of “best available science” and approaches to integration of science in both the LRMP planning process and the EIS on the rule itself. While commenters generally agree on the value science in land management, many commenters felt that the definitions of the science to be required in planning must be clarified and refined. Several commenters suggested adopting a standard similar to the Data Quality Act of 2001. Many commenters urge the agency to avoid using the term “best available science” in the planning rule, because it doesn’t contain any criteria and can be the easy subject of debate and interpretation.

Many respondents suggest incorporating peer-reviewed science as a baseline. One commenter suggests:

141.3 - Peer-reviewed science, up-to-date monitoring data and site specific information should underlie decisions made on forests and grasslands developing new management plans. The EIS for new plans needs to identify the science supporting the decisions and discussions regarding this project.

A common analysis theme related to the role of science comes from respondents questioning the validity of recent climate change data, and importantly, recent changes in even the terminology used to describe climate change. Some cite recent events that they feel call the body of climate science into question and urge the agency to avoid climate change as a forest management principle. Conversely, many other respondents applaud the integration of climate change considerations into forest planning.

Respondents both applaud and criticize integration of a Committee of Scientists panel, some feeling it is “essential” in the preparation of the new rule while others feel it has been unproductive in the past and brings “personal views” into the process. Several respondents give opinions about where the scientists should come from, and what their credentials should consist of.



A significant variety of opinions about the scope of, need for, and alternatives to the planning process were received.

Several respondents asked that the process contain specific provisions to consider and address both Roadless and Wilderness issues. This included numerous requests for expansion and addition of Roadless/Wilderness areas. One commenter asked that the planning rule direct that decisions regarding management allocations for IRAs be made whenever forest plans are revised. Conversely, numerous requests were included asking the agency to focus management efforts on multiple-use sustained-yield principles as it undertakes planning revisions and analysis.

Many counties submitted comments requesting that analysis be made locally and adapted to “local management”, “local control”, and “local collaboration”. Many commenters criticized statements and representations in the NOI and questioned their scientific basis or integrity. Several commenters addressed the question of “uncertainty” and discussed how it affects forest planning decisions.

### **Scope of Rule/DEIS**

Many respondents provided comments relating to the proper scope of the new rule and of the Draft EIS. These comments were extraordinarily diverse, but contained a few common themes. One common theme was the value of building on past experience and efforts with Forest Service planning rules. A few commenters discussed the value of the 1982 rule, which they feel has “stood the test of time” and worked well for decades. Many commenters stated the desire to see the planning rule result in the simplest possible planning approach. One commenter states:

243.4: “Keep it simple – define and specify only principles and core values that will be used to guide development of the plans. The planning process should be simple, straightforward, transparent, and provide clarity. These traits are critical for both land management planners and the general public. The planning process should easily be followed by the average citizen. The scope of individual plans should be limited to get the job done.”

Another common desire in the scope of the rule is to make it easy to implement, ensuring that compliance is maximized and litigation minimized. Respondents point to the NOI’s discussion of the costly and complex nature of recent iterations of planning rules and encourage the agency to capitalize on the opportunity to avoid these challenges while promulgating the new rule.

Several commenters discussed the specific details of the purpose and need statements of the NOI. While a few support the statements as described in the NOI, several feel the statements should be refined or replaced.

Many respondents also outlined alternatives they feel should be considered. A very common request was consideration of an alternative with a clear recreation emphasis, which respondents feel was neglected in the NOI altogether. Another common group of comments supports development of an alternative that supports a more protective wildlife and conservation-oriented approach to forest management.

Several respondents also discussed the timeline they feel is appropriate for LRMP development and revision. Most commenters felt that the timeframe for development of LRMPs is currently too long and needs to be shortened substantially (generally 15-36 months). Generally speaking, a 10-15 year revision cycle was viewed as acceptable in the context of a reasonable LRMP development schedule. One commenter felt that requiring reviews every 10-15 years doesn't make sense if the LRMP takes 10 years to develop initially.

A final theme in the area of analysis relates to monitoring. Several respondents felt that the agency needs to carefully design, plan, and budget for monitoring activity that allows it to protect resources and understand changing conditions. Many feel that monitoring should cover all activities and all major forest resources, and that such a monitoring approach is essential to understanding actual cumulative effects and resource issues. Some commenters feel that the inventories need to be clear and specific, and on-the-ground instead of computer-modeled.

### ***Process (Including Process Principles 1-3)***

Commenters on the NOI provided extensive input on process considerations related to the planning rule. Generally speaking, most of the comments on process followed the outline of the NOI, and were directed at the process principles enumerated in the NOI. These comments provide many perspectives and suggestions for the agency in the context of each question posed in the NOI. This summary section follows the outline of the NOI in summarizing the comments received in relation to the specific questions asked in the NOI. For reference, the questions asked are numbered and included in boxes prior to the discussions of public responses.

***Process Principle 1: Land management planning could involve effective and proactive collaboration with the public.***

- A. How could the Agency foster collaborative efforts? What kinds of participation, forums for collaboration, and methods of providing input have you found most engaging?
- B. What should the rule require to ensure a planning process that is both efficient and transparent while allowing for full public collaboration and participation within a reasonable timeframe?
- C. What kinds of information, methods, and analyses should the Agency provide to the public during the planning process to aid understanding of the possible consequences of a proposed rule and alternatives?
- D. What kind of administrative review process should be offered to the public in the planning rule? Should there be a pre-decisional objection or a post-decisional appeal process?

#### ***Process Principle 1A***

More than 200 comments were received in relation to the question “How should the agency foster collaborative efforts?” Commenters discussed dozens of collaboration vehicles, including public meetings, facilitated meetings, small/large group formats, web-based and social media, written comments, and many others. There was no clear consensus around the “best” or “preferred” method for collaborating; each commenter had his or her own preferences.

Several commenters urged the agency to listen to all parties and categories of users in the process of developing the new planning rules. Perhaps the most common general process comment was that the rulemaking process, and any resulting planning processes should be truly open, transparent, and collaborative. Some related concerns about the commenting or collaboration processes in general, identifying a feeling of not being listened to or heard in the process. A few commenters provided general cautions about collaborative input, indicating that the agency cannot discard the inputs gained in the process of collaboration and retain credibility. Some also cautioned that employing “new” social media in the collaborative process will create a number of new concerns that the agency may not have considered, resulting in new process and legal issues:

269.1: "Will these comments be considered part of the official record? How will agency responses to comments received through these means be used? Will agency

comments in response to social media postings be considered official agency positions? Will these comments be filtered through the content analysis process? If so, how will these comments be shared with all interested parties in a timely and accurate manner? How do these new methods of public input relate to the requirements of the APA, NEPA, and Federal Advisory Committee Act (FACA)?"

Many commenters provided general discussions of collaborating principles that they felt should be followed. Very commonly, these discussions focused on gaining stakeholder input at a local scale. One commenter (158.5) suggested that the Forest Service "...develop a sufficient number of collaborative planning groups at a size and scale that ensures that local participation is maximized and an adequate understanding of local landscapes is reflected in the planning process." Commenters cited the needs for faster planning cycles, earlier involvement of stakeholders, and meaningful intergovernmental (including Tribal) cooperation and coordination.

Several commenters also felt more comfortable with a highly defined public involvement strategy (e.g., NEPA's process), rather than a loosely defined collaboration process. These respondents often felt that complicating or broadening the scope of the process was unnecessary and potentially confusing; many commenters want simpler planning processes. These commenters often felt the agency should not try to "re-create the wheel" with its collaboration processes, and urged the agency to stick with NEPA's public involvement program to accommodate the needs of the process. One commenter identified the various vehicles already in place to manage the requirements for public involvement. One commenter states:

(259.38): "The USFS should redouble efforts to comply with the laws and regulations that mandate collaboration and cooperation with local governments and local citizenry. Federal legal requirements to coordinate with local governments include: - National Forest Management Act (16 USC [section] 1604) - Forest and Rangeland Renewable Resources Planning Act [section] 6 (16 USC 1604(a)) - National Environmental Policy Act [section] 101(a), 102(c), (42 USC section] 4331(b)(5) & [section] 4332(2)) - Multiple Use Sustained Yield Act of 1960, [section] 3 (16 USC [section] 530) - Soil and Water Resource Conservation Act (16 USC [section] 2003 & [section] 2008) - Outdoor Recreation Act (16 USC [section] 4601) - Regulatory Flexibility Act (5 use [section] 601-612) - Intergovernmental Cooperation Act ([section] 401 and 3 USC [section] 301) - Intergovernmental Review of Federal Programs - Presidential Executive Order 12372 - Facilitation of Cooperative Conservation - Presidential Executive Order 13352 - Environmental Justice - Presidential Executive Order 12898 [section] 302(d) - Coordination with Other Public Planning Efforts (36 CFR [section]219) - Travel Management Rule (36 CFR [section] 212.53) - Joint Planning (40 CFR [section] 1506.2 (b)) - Cooperating Agencies (40 CFR[section] 1501.6) - US Forest Service Manual (FSM) 1921.63(a) - US Forest Service Manual (FSM 1950.2) - Integrated Resource Management Process-the Road to Ecosystem Management (USFS Region III, 4th edition, Appendix A)."

Along similar lines, several respondents discussed the need for adjustment to the Federal Advisory Committee Act, which they claim precludes public collaboration in internal agency decisions.

### ***Process Principle 1B***

The next question posed in the NOI related to how to ensure efficiency and transparency while allowing for full collaboration and participation within a reasonable timeframe. A common issue involved using the content analysis process and/or contractors to accomplish public involvement, which some criticized.

Efficiency was a minor theme, with only a few specific comments focused on how to make the process more efficient. A common theme was related to collaboration. Many respondents felt that involving the public in a correct way at the front-end of the process could shorten the process. Others identified the value of requiring the plans to be completed in a reasonable timeframe. Some respondents stated or inferred that efficiency wasn't the key, but that ensuring correct collaboration and legal compliance with NEPA and other laws would ultimately lead to the highest levels of efficiency.

Transparency was a major theme. Most of the related comments simply stated the general need for complete transparency in the process. These commenters often wanted the agency to have a clear, unified strategy for informing the public about planning activities, and wanted the agency to let them know exactly what was happening with plans, documents, and decisions at any given stage in the process.

Some specific transparency themes emerged. Many commenters stated the need to provide transparency in the role of local government participation and local citizen engagement. For many of these commenters, their own role and impact in the process was inadequate. Some local governments, in particular, stated that the agency's approach for involving them was not clear, and the essence of their role or value of their input was not defined.

Others commented on the need for access to data (GIS, planning, and other data) that are used in the development of plans and NEPA documents. Some discussed the challenges related to reviewing the scientific and analytic data used for planning. Suggestions were made for electronic linking of resources, web-based availability of studies, monitoring, and resource data, and similar mechanisms for providing access to the information being used to reach decisions. These types of comments emerged several times in the context of NEPA studies.

Several respondents also discussed the timeframe issues involved in various planning processes. Some lament the many years involved in some planning processes, and urge the agency to put absolute time boundaries around planning. One of these respondents states that these multi-year timeframes are "too long to sustain a true collaborative effort and use the most up-to-date science and management thinking".

### ***Process Principle 1C***

The NOI asked what kinds of information, methods, and analyses should be provided to the public to aid understanding of the possible consequences of a proposed rule and alternatives. The respondents had many specific suggestions, but they focused mostly on making all data available in a reasonably easy way. Some suggested methods of getting at information (e.g., an easy-to-use web-based approach), while others focused on the types of information that should be made accessible. Some commenters would like to have GIS data available so they can analyze the resources that are of concern to them

individually. Some commenters asked that data be placed on maps instead of in text and that a greater focus be placed on quality mapping. In many comments, the linkage between this process principle and the notion of transparency was emphasized.

### ***Process Principle 1D***

The NOI asked what kind of administrative review process should be offered to the public in the planning rule (specifically, should there be a pre-decisional objection or a post-decisional appeal process). One response (letter 14) provided extensive technical edits to clarify a process of administrative review the respondent would like to see employed.

Respondents weighed in with strong support for both pre-decisional objection and post-decisional appeal processes. They provide multiple, specific rationales for the use of either process, citing the time involved, the status of the decision in the context of the appeal, and the effectiveness of each process as a remedy. Other respondents felt that both methodologies should be in place, and several respondents indicated that if collaboration is carried out effectively, administrative review processes are generally not needed.

***Process Principle 2: Plans could incorporate an “all lands” approach by considering the relationship between NFS lands and neighboring lands.***

- A. How should the planning rule account for the relationship of NFS lands to surrounding landscapes?
- B. What other planning and assessment efforts or processes at the national, state or local level should the Agency look at that could inform an “all-lands” approach?

### ***Process Principle 2A***

The NOI discussed using an “all lands” approach for management, and asked how the planning rule should account for the relationship of NFS lands to surrounding landscapes. This particular question generated strong opinions that covered an array of approaches. Many respondents felt that the Forest Service should limit its management and planning to the lands under its jurisdiction (i.e., NFS lands). Some respondents felt that an all-lands approach could work if it was careful to adopt the planning of the other agencies/landowners/jurisdictions. Some felt that an all-lands approach was essential and logical, noting that resources don’t observe administrative boundaries.

A major theme was the relation of forest planning to private lands. Many respondents felt that privately managed lands were better managed than surrounding NFS lands, and were forceful about asserting that they did not want a layer of Forest Service management requirements to deal with. Nearly all respondents commenting on this theme felt that collaboration on land management activities between the Forest Service and private landowners was essential. A few respondents noted the challenges that are caused by these jurisdictional and ownership interfaces, and supported the idea of developing acquisition planning for inholdings.

### ***Process Principle 2B***

In the NOI, the Forest Service asked what other planning and assessment efforts or processes at the national, state or local level inform an “all-lands” approach. Well over 100 responses focused on the question. Intergovernmental planning coordination was one of the strongest themes from the NOI commenting. Respondents cited federal, Tribal, state, local, and other types of planning that they felt the Forest Service should be careful to consider and integrate into forest plans. A few sample comments:

- 56.2: “Coordination with county government is particularly important. County government is the one level of government that represents the citizens who are directly affected by federal land use plans. It is county government that is the spokesperson for local populations and which, ideally, can create a consensus around the balanced use of federal lands. A coordinated planning process can strengthen forest plans and the communities that are so dependent on those lands for their economic, social and cultural health.

Recent planning rules, in our [Inyo County] estimation, have not sufficiently protected the obligation to coordinate planning efforts with local land use plans. To an important extent, this has led to the disenfranchisement of local governments and the communities they represent in the federal planning process. Inyo County supports collaboration. But, while collaboration is a valuable exercise in public participation, it seldom involves more than a series of bargains struck between various interest groups, none of which represent more than a segment of the population, and the most successful of which are the best organized or best funded rather than best representative of the citizenry.”

- 109.5: “We [Association of Fish and Wildlife Agencies] support development of a new planning rule and collaborative efforts to develop, amend, and revise forest plans as required by law. We are requesting early and meaningful involvement by our state fish and wildlife agencies in this endeavor.”
- 153.2: “We [California Valley Miwok Tribe] are concerned because we have been told that there is not any mention of strategy for agency tribal consultation or conferring with tribal communities and traditional practitioners. The NOI is silent on this matter and merely refers to public involvement. The failure to properly engage Tribes in the formulation of a National Planning Rule is contrary to established law.”

Respondents almost uniformly commented that Forest Service planning efforts were strengthened when done in careful collaboration with local governments and local interests. This question spawned dozens of detailed comments relating to the perceived need for much stronger “cooperating agency” provision to solidify the process and outcomes to be achieved through the participation of cooperating agencies in the process.

***Process Principle 3: Plans could be based on the latest planning science and principles to achieve the best decisions possible.***

- A. How can the planning rule support the creation of a shared vision for each planning area through the planning process?
- B. Local and regional differences will have an impact on desired conditions and on the successful creation and implementation of a shared vision for any given planning area. Given that different areas will have different needs, should the planning rule allow a choice of planning processes? How could the planning rule create different process choices, and how could they be presented in the rule? What kinds of provisions would need to be included to guide and evaluate a process choice?
- C. Much discussion has been centered on how land management plans should be viewed; are they strategic documents that lay the foundation for specific future actions to help meet unit goals? Or, should land management plans also make project or activity decisions?
- D. Based on your response to the question above, what is the range of options for fully complying with NEPA during land management plan development, amendment, or revision?
- E. Should the new planning rule require standards and guidelines that are required for all plans?
- F. How can the agency analyze and describe the environmental effects of a planning rule in the environmental impact statement?

***Process Principle 3A***

The NOI discussed various questions related to use of the latest planning science to enhance decisions. Generally speaking, most respondents agree to the use of the “latest planning science” in planning documents, although some have also indicated that some aspects of forest management (e.g., effectively executing monitoring), are more important than gathering the latest science while planning.

The focus of question 3A is how the rule can support creation of a shared vision of each planning area through the planning process. As is the case with most other areas of comment on this project, local-level collaboration was a prime theme. Commenters expressed some frustration with past processes and outcomes that didn’t represent local needs. Many commenters saw the shared vision as being the natural outcome of excellent collaboration efforts that involve stakeholders early.

Some commenters posited that creation of a “shared vision” is not necessary because the agency’s responsibilities for forest management are already clear and are dictated by various laws. Others question whether it is not possible to create a shared vision of forest management because of the numbers and types of users and their competing uses.

A few commenters gave detailed discussions of why they feel the Forest Service should eliminate or limit “shared visions” to what is realistically possible within a planning area and for a given resource. Pervasive in these comments is the idea that sometimes the planning process creates goals or desired future conditions that cannot be accomplished realistically. The result can be plans and projects that are difficult to administer because



they are constrained by planning requirements that can't be realistically achieved. For example:

183.3: "We...conclude it is detrimental to good forest planning to emphasize development of "visions" or "desired conditions" for the forest or portions of the forest if the vision or desired condition is outside the budget or capacity of the Forest Service to accomplish. The recent experiment with the failed 2005 and 2008 planning rules encouraged the public and forest staff to formulate "aspirational" desired conditions for the forest and special areas. "Aspirations" for the forest by the Forest staff and the public outstrip the actual capability to turn the aspirations into reality. When visioning and development of desired conditions becomes the focus, the planning process becomes a distribution of symbolic gratification rather than the opportunity to make hard choices about what can be accomplished. Subsequently, when the plan revision begins there is a litany of complaints from the public expressing frustration that the aspirational goals and objectives of the last plan were not accomplished."

### ***Process Principle 3B***

The NOI asks whether the planning rule should allow a choice of planning processes to accommodate local and regional dynamics, and asks further how the planning rule should create different process choices, and how could they be presented in the rule. Comments generally followed two themes: flexible local vs. standardized national planning. Very little information was included to detail exactly how the rule could create different process choices, other than in giving the local forest unit discretion to use tailored collaboration tools and methods.

Many respondents felt that the most locally-oriented, decentralized planning process would be the best one. These commenters contend that local conditions should dictate the nature of the process to be used. These commenters generally agree that a choice of planning processes is appropriate, although they generally didn't indicate what planning choice they would like to use, or how it would differ from the ones used elsewhere.

Conversely, several commenters felt that the agency should always pursue planning under a uniform set of standard processes, fearing that a lack of process uniformity could lead to confusion, management instability, and legal problems for the agency. Some suggested adaptations of various existing frameworks (e.g., the 1982/2000/2008 rules).

### ***Process Principle 3C***

The NOI asks how land management plans should be viewed (strategic documents that lay the foundation for specific future actions to help meet unit goals or tactical documents that also make project or activity decisions). This question became an area of substantial interest, with about 100 comments. Most commenters felt that the appropriate use of an LRMP is for strategic direction, and that these plans generally shouldn't focus on project-level decision-making. Other commenters felt that land management plans can serve both purposes, and some felt that certain project or activity-level decisions are most appropriately documented in the LRMP EIS.

220.38: "Land management plans should achieve both objectives. Some flexibility should be allowed at the project level, but should be informed by the detailed

direction of the forest plan, and associated project implementation level environmental analysis.”

The answers provided to this question wandered into the subject matter of principles 3D and 3F, with many respondents making discussions about the needs and requirements of programmatic vs. site-specific analyses and asserting the need or legal requirement for various types of NEPA analysis.

### ***Process Principle 3D***

The NOI asks what the range of options is for fully complying with NEPA during land management plan development, amendment, or revision. Commenters provided numerous comments on the question, which tended to focus on the need to integrate a NEPA analysis (EIS) with the development of each LRMP. Some commenters felt that lesser levels of NEPA analysis were appropriate for amendments and revisions, depending on the level of environmental effects that were likely. Some see the LRMP process as independent of project-level decisions and impacts, and do not feel a NEPA analysis is needed for plans.

One commenter noted that if project level decisions will tier to the LRMP, the LRMP itself must fully comply with NEPA. Some commenters feel that the NEPA analysis for LRMP documents can be streamlined, more focused, and tighter than currently occurs.

### ***Process Principle 3E***

The NOI asks whether the new planning rule should require standards and guidelines all plans. A high level of consensus was expressed around the need for standards and guidelines as an outcome of each individual LRMP. However, many respondents felt that the agency should not dictate a specific set of standards and guidelines to be applied across all plans. They felt such an approach would limit the flexibility of individual units to manage specific resources and resource challenges effectively.

Even so, some commenters expressed support for a set of uniform standards and guidelines to be applied across all plans. Several respondents also indicated a desire to see standards and guidelines become clearer (essentially stating what types of activities may and may not be undertaken in specific areas).

### ***Process Principle 3F***

The NOI asks how can the agency analyze and describe the environmental effects of a planning rule in the environmental impact statement. Commenters provide various ideas and approaches that are mostly detailed and specific. Comments on this process principle were similar to the comments received in relation to principle 3D above. Generally speaking, respondents discussed the need or lack of need for environmental analysis, based on their views of what an LRMP does, whether it is purely programmatic or contains site-specific elements, and whether the LRMP process itself involves discernible effects upon the human environment.

Some respondents question how the specific effects of a nationwide rulemaking such as the one proposed can be realistically identified and documented, while others provide specific strategies for describing an appropriate baseline and developing impact analyses on the planning rule’s EIS.

## **Activities**

The value and importance of various activities on NFS lands emerged as a key theme. Comments related to activities on NFS lands were divided into commercial, government, and private activities.

In relation to commercial activities on NFS lands, commenters both supported and opposed a variety of commercial uses, including grazing, mining, logging, and drilling. Those who oppose commercial uses often lumped several types of activities together and cited damage to forest resources as the rationale for stopping commercial activity.

Respondents that support commercial uses often cite legal reasoning that allows the activity and assert specific rights, and often indicate that their activities have social, economic, or even environmental benefits. Some agricultural and farm organizations express concern over the lack of commercial focus in the NOI.

231.1 - We [Wyoming Farm Bureau] are concerned with the lack of focus towards any commercial interests or the Forest Service use mission as a central management objective in either the NOI or the supporting materials released by the Forest Service to date.

Several other commenters felt that using forest resources commercially amounts to exploitation by “profiteers”. Some forest-dependent businesses provided information on the legal basis and requirements for allowing their uses and activities. Along these lines, nearly 300 comments touched on timber harvest, easily the largest theme in the “activities” codes. In general, many respondents took the opportunity to express their opposition to timber harvest/logging and often gave their own rationales for opposition. However, numerous other comments provided support for timber harvest, seeing it as a remedy for fire/fuel conditions and insect/disease control, and as an essential tool for forest management.

Comments about government activities generally focused on the nature of forest management. Commonly, respondents recited views to the effect that government activities should focus on either protecting natural resources (e.g., water, air, wildlife), or meeting a multiple-use mandate that includes commercial use, motorized recreation, and other private activities. A few commenters discussed the agency’s role in past and future fire policy and management, generally agreeing that fire management policy is essential, but should be revisited and integrated into the larger planning effort. A few commenters discussed the relationship of forest management to other agency/private land management.

Private activities on NFS lands emerged as the most commonly addressed single concern across all comment codes. Numerous respondents feel that the Forest Service planners have not provided adequate recreation opportunities, including recreation for the disabled. Many feel that the importance of public recreation (especially motorized) should be emphasized in the planning regulations, and that diverse range of recreation activities should be identified as one of the key “Ecosystem Services” that Land Use Plans should address. Several suggestions for integrating private recreational use were submitted. For example:

284.3: “The NOI all but ignores a core function of the Forest Service; providing opportunities for recreation. It is our belief that land management plans should account for all sorts of recreation opportunities including motorized uses. Instead, the NOI treats recreation as an afterthought while focusing on nebulous and ill-defined concepts like climate change and “restoration.” We [Professionals for Managed Recreation] believe land management plans should include recreation as a core purpose and should be written in such a way that they seek to provide as many sustainable opportunities as possible. Recreation is a major way that the public connects with the national forests. This helps them develop an understanding of the land and the land management needs. They also develop a sense of “ownership” in the forests and that reinforces the concepts of conservation and responsible use. By treating recreation as an afterthought, as the proposal does, this opportunity is lost and the public’s commitment to supporting the forests and the Forest Service is greatly diminished.”

Several comments were also received contending that the forests already provide for every type of recreation use (including motorized). These comments often request that the agency consider limiting the amount of motorized use that is allowed on the forests. Some go farther, asking that the agency prohibit ORV/ATV use either permanently or until inventories of roads and trails are completed and restoration/sustainability factors are considered (365.3). Several commenters contend that the Forest Service should put ecosystem health and restoration above any other private or commercial activity.

Some commenters provide specific requests for the agency. A common thought was to use “zoning” to help indicate and clarify where activities of a specific nature are or are not to be permitted on NFS lands.

131.4: “The regulations should require National Forests to zone areas of each National Forest or Grassland by what type of activities will be allowed.”

In all, the comments on private activities on public lands represent an often-polarized snapshot of sentiment supporting each party’s preferences in terms of personal recreation and use. Perhaps more than any other aspect of public comment, these submissions are personal and emotionally-charged.

## ***Land and Resource Planning (Incl. Substantive Principles 1-5)***

The NOI contained several “substantive principles” for land and resource planning. Many respondents followed the outline provided in the NOI, and gave a variety of comments on each principle and point. These comments are diverse and specific and merit careful review. As with the Process Principles, the comments on each of these Substantive Principles is analyzed and presented in the context of the questions posed within the NOI.

### ***Substantive Principle 1: Land management plans could address the need for restoration and conservation to enhance the resilience of ecosystems to a variety of threats.***

- A. What do you see as the biggest threats to forest and grassland health and ecosystem resiliency?
- B. How do you define restoration? What is your concept of restoration? How can the planning rule foster restoration of NFS lands?
- C. What kinds of conservation efforts can enhance ecosystem resiliency and prevent degradation?

### ***Substantive Principle 1A***

Multiple comments about Forest Restoration and Conservation were processed. Many different viewpoints are represented in relation to questions about the major threats to forest and ecosystem resiliency. The most commonly cited threats include climate change, OHV use, commercial logging, wildfire and fuels management, invasive species, and watershed health. Many support the idea that climate change is increasing the epidemic of Bark Beetle while inactive management by the Forest Service is increasing risk due to lack of Fire and Fuels management. Many claim that OHV and commercial activities are fragmenting remaining wildlife corridors and refuges while damaging watershed quality. Some comment that the amount of litigation by environmental groups prevents management actions from being implemented. Sample statements are included below:

192.3: “What do you see as the biggest threats to forest and grassland health?”

Answer: The biggest threat to forest and grassland health is the increasing amount of overmature forest and rangeland vegetation building up on our public lands, which is becoming increasingly susceptible to insect and disease attack, and, accompanied by an increasing density of vegetation in the understory, results in large catastrophic wildfires that are outside the realm of natural variation for fires in these ecosystems. During periods of drought these overmature, overcrowded forests burn with an intensity we have not seen since the fire of 1910 in Idaho.”

220.1: “We [Georgia ForestWatch] believe the greatest threats to forest and grassland ecosystem resiliency is above all, abuse and mismanagement of the land by people. We believe mismanagement includes large scale industrial harvesting, “cut and run” style logging, over use of lands by recreation groups, inappropriately located and poorly maintained FS system roads which negatively impact watersheds, and mismanagement of fire, which includes both inappropriate controlled burning and fire

suppression. Additionally non-native invasive plants, insects, and pathogens are wreaking havoc on native forest ecosystems. We believe the new NFMA planning rule process must address, define and guide management on these issues through management objectives and implementation of Forest Service activities.”

### ***Substantive Principles 1B and 1C***

The NOI asks how to define and foster restoration, and what kind of conservation efforts can enhance ecosystem resiliency and prevent degradation. The answers to these questions came back connected, so the analysis has been combined for items 1B and 1C.

The responses to these questions were long and very detailed. Many commenters want the concept of “restoration” clearly defined. A few commenters were specific in stating they did not want restoration to be defined as returning conditions to pre-settlement conditions, while to others that was the very essence of a restoration baseline. This aside, most commenters provided definitions that were generally similar. For example:

“Restoration simply means bringing the forest and grasslands back to a lush green state that is resistant to insects and disease.” “Restoration is moving a resource back to a condition that it was at a certain point in time.” “The common definition of restoration is a set of processes or practices designed to return an ecosystem to some predetermined former state.”

While many people understood the concept of restoration in a similar way, there were very detailed and divergent approaches toward accomplishing restoration. Ideas for restoration included mechanical treatments, controlled burns, fuel reductions, controlling illegal/unauthorized uses, defining and protecting wildlife migration corridors and habitat, reintroduce native species and eradicate invasives, and many others. Some approaches were very structured and defined, including process, measurement, and monitoring components. For example:

262.30: “The planning rule can foster successful ecological restoration on NFS lands first by requiring forest plans to define ecological restoration unambiguously. Second, by requiring that ecological restoration be based on science and tied to measurable results, such as “acres restored”, ecological restoration will have a framework within which to operate and a measure through which to receive funding. Finally, success will be ensured if ecological restoration is focused in the areas with the most need and best access. Areas of need should be defined as areas in which the natural communities have been most altered by human activity and where management can accelerate the recovery of those natural communities. Third, restoration projects, particularly experimental ones, should be conducted at appropriate scales and with measurable objectives which can be and are monitored. The new regulations should ensure that restoration projects are monitored and evaluated to determine whether and to what degree their objectives were achieved, and that evaluation informs future restoration projects. Fourth, restoration projects, particularly experimental ones, should be conducted at appropriate scales and with measurable objectives which can be and are monitored. The new regulations should ensure that restoration projects are monitored and evaluated to determine whether and to what degree their objectives were achieved, and that evaluation informs future restoration. Fourth, restoration projects, particularly experimental ones, should be conducted at appropriate scales

and with measurable objectives which can be and are monitored. The new regulations should ensure that restoration projects are monitored and evaluated to determine whether and to what degree their objectives were achieved, and that evaluation informs future restoration projects.”

The discussion of conservation efforts to enhance ecosystem resiliency followed the same general lines as restoration comments. The vehicles considered appropriate for accomplishing restoration were often the same as those considered appropriate for conservation efforts (e.g., restoring the land to a natural fire regime). However, some respondents cautioned that individual forests should delineate areas targeted for restoration and other areas targeted for conservation.

***Substantive Principle 2: Plans could proactively address climate change through monitoring, mitigation and adaptation, and could allow flexibility to adapt to changing conditions and incorporate new information.***

- A. How can the planning rule be proactive and innovative in addressing the need for climate change adaptation and mitigation?
- B. What kinds of data, research, and monitoring could assist land management planners to incorporate climate change adaptation considerations into plans?
- C. How should the planning rule address uncertainty? How do other public and private entities recognize and incorporate uncertainty in their planning efforts?
- D. How can a new planning rule appropriately build in the flexibility land managers will need to adapt to changing science, information or conditions? What mechanisms should be used to incorporate new data? Do you know of any successful adaptive management regimes that can inform our process?
- E. How should plans anticipate and address changing conditions or impacts outside of agency control? How can external factors be incorporated or recognized in plan guidance and requirements?

***Substantive Principle 2A***

Nearly 200 comments centered on support/opposition toward using Climate Change as a principle in the NOI. Many preservation/conservation entities praise the inclusion of Climate Change in the Substantive Principles and feel that full monitoring and mitigation is necessary to preserve and prepare forests for future changes. Some blame the epidemics of insect and disease on climate change and the periods of drought they feel have resulted. Several suggestions about exactly how to proactively address climate change were presented. For example:

171.5: Plans could proactively address climate change through monitoring, mitigation and adaptation, and could allow flexibility to adapt to changing conditions and incorporate new information. This is critical in ensuring ecosystem health. It is essential to address climate change in order to make sound and effective management strategies.

Many respondents call in question the science behind climate change and disagree that the Forest Service should incorporate the principle in the NOI without proper scientific evidence. For example:

676.10: "It is unwise to "proactively address climate change" in the planning regulations. The agency's own "Climate Change Considerations in Project Level NEPA Analysis" (January 13,2009) states that the effects of climate change are unknown, will vary regionally and will range the gamut from increased droughts to increased flooding. The document states: "It is not currently feasible to quantify the indirect effects of individual or multiple projects on global climate change and therefore determining significant effects of those projects or project alternatives on global climate change cannot be made at any scale." The only thing that is certain is the climate will change from its current and/or its historical condition. Effects of climate change are unknown. Impacts to the climate from human activities occurring on the forest, as well as the impacts of climate change on the forest, cannot be made at any scale."

Respondents offer several suggestions oriented at helping forest ecosystems adapt to changing climatic and cyclic conditions, usually consisting of standard treatments and restoration principles. Many commenters feel that adaptive management principles can provide the tools necessary for addressing climate change within LRMP frameworks.

### ***Substantive Principle 2B***

The NOI asks what kinds of data, research, and monitoring could assist land management planners to incorporate climate change adaptation considerations into plans. Respondents provided little consensus on the question. However, a number of ideas were forwarded. Some felt that the data and research around climate change needed to be revisited specifically before proceeding with specific planning. One respondent (147.14) feels that instead of managing according to climate change principles, the "...National Forest System should be managed based on soils, climate, precipitation and geography."

A few respondents cited the need for the Forest Service to better coordinate research efforts with universities and other government entities that may have better quality and more localized data available. Many respondents gave specific lists of data needs that should be incorporated, including: vegetation composition, precipitation and hydrology, wildlife and human utilization of resources, seasonal climate forecasts, fire danger ratings, ecosystem service valuation, vulnerability assessment to understand which species are most vulnerable to climate change, local climate parameters (especially precipitation, temperatures and wind), disturbance regimes (fire, insects, wind, ice), plant community changes, fish and wildlife species range and population changes, vegetation growth and mortality, potential effects of CO<sub>2</sub> enrichment on water use efficiency, and carbon inventories and fluxes.

Several respondents again emphasized the need for the use of actual data that is collected and measured thru robust, on-the-ground monitoring as opposed to using data from computer models (especially where the data may directly impact decisions on the ground.) Some of these respondents again emphasized the need to blend the 2001 Data Quality Act standards into the rule.



### ***Substantive Principle 2C***

The NOI asks how the planning rule should address uncertainty, and how other entities/agencies recognize and incorporate uncertainty in their planning efforts. A wide variety of specific comments resulted. A clear common theme was adaptive management at the plan and project level. One respondent felt the plan revision and amendment process should be simple and rapid enough to allow managers to respond to changing conditions. A few respondents felt that the concept of uncertainty can be addressed in the NEPA process, which provides an analytic framework for risk identification and analysis of how various alternatives address the uncertainty.

One respondent indicates that the insurance industry has been managing uncertainty for years using a “risk management planning” strategy. Another indicates that private entities use risk ratings for uncertainty in planning. Others maintain that agencies and private companies maintain strategic planning direction while making tactical adjustments using “alternative management approaches” to address changing or uncertain conditions. One respondent states that forest plans should acknowledge uncertainty, but:

(253.41): “...predict ranges of outcomes or scenarios for regional conditions and trends based on the best science. These ranges of outcomes would give sideboards for management flexibility and adaptive management that inform both the public as well as the agency of what the limits of adaptive management actions under plans are likely to be. The shift between options suggested by different scenarios should be a transparent process open to the public and informed by the best science available, both within and outside the agency. The new NFMA Rule should include a scientific review and public comment provision for choosing between scenarios or incorporating entirely different scenarios if monitoring and evaluation indicate the need for additional scenarios outside original plan parameters. This provision would allow plans to be readily amended with adequate review and public involvement to adapt to new information and changing conditions. Scenario-based plans as well as the uncertainties of adaptation to climate change make it imperative that a robust monitoring and evaluation program be in place and be funded and staffed adequately. This should include species-level monitoring where appropriate and necessary.

Several commenters also discussed addressing uncertainty with the “precautionary principle”, stating that actions with negative effects that could be long term and are difficult to reverse should receive special scrutiny.

### ***Substantive Principle 2D***

The NOI asks how a new planning rule can appropriately build in the flexibility land managers will need to adapt to changing science, information or conditions, and what mechanisms should be used to incorporate new data. It also asks for information relating to successful adaptive management regimes that can inform this process.

In response to these questions, the public again used wide-ranging responses with only a couple common themes. Common themes included employing adaptive management strategies that do not limit flexibility, requiring a clear and easy process for amending and revising LRMPs to adapt quickly to changing conditions or needs, and employing a clear

and precise monitoring framework. In fact, the need for quality monitoring was repeated multiple times in the body of comment and supported often in extensive detail:

(218.8): “Monitoring and adaptive management are key to informed planning and project implementation, and the planning rule should require both at the appropriate scales. In our [Sustainable Northwest et al] experience, adaptive management has often failed because there was little emphasis (especially funding) placed on follow-up monitoring of on-the-ground projects. Without this information, it is impossible to learn from successes and failures, and to incorporate that information into future project design. Generalized goals, accurate feedback loops (trend monitoring), and timely revisiting of the planning assumptions, could lead to a more simple and cost effective plan amendment process. A plan that allows flexibility could include differing treatments or practices to similar landscape segments for the specific purpose of acquiring data and learning. Although it has largely failed due to lack of funding and the lack of a practicable mechanism to implement changes to the framework, the adaptive management procedures from the Northwest Forest Plan, including Adaptive Management Areas, should inform the agency’s planning rule.”

Some commenters feel that the needed flexibility is already present in the existing laws and regulations. Some cited NFMA itself, while others cited multiple coordinated sets of laws and regulations. For example:

(319.27): “The process for amending forest plans, as provided by the 1982 NFMA regulations, the process for supplementing NEPA analysis, as provided by NEPA, and the requirements for reinitiating ESA consultation, as set forth in the ESA regulations, should already set forth the framework for adjusting forest planning on a national forest or region to adapt to changing science, information, or conditions. Monitoring is centrally important to adaptive ecosystem management, which actively seeks to learn from scientific uncertainty. The key to learning is a well-defined monitoring strategy that provides a “feedback loop” through which new data on management effects can be assimilated and means to improve practices are described. See Lee, K.N., “Appraising adaptive management,” *Conservation Ecology* 3(2):3 (1993). Management that shuns rigorous effectiveness monitoring is not adaptive at all.”

### ***Substantive Principle 2E***

The Forest Service asks how plans should anticipate and address changing conditions or impacts outside of agency control, and how external factors can be incorporated or recognized in plan guidance and requirements. Several commenters assert that the Forest Service cannot or should not attempt to address changing conditions or impacts outside of agency control.

Other commenters provide various ideas, many of which relate to adaptive management, collaboration/coordination with landowners and other jurisdictions, and employing landscape-level or “all-lands” planning principles. One comment combined many of these ideas:

281.9: “Collaborative planning at the landscape scale, rather than just at the scale of the administrative boundaries, is necessary. This will allow the LMP to incorporate the trends going on in adjacent private lands, incorporate relevant impacts on federal

lands, and plan for how to address related needs of neighbors through assistance programs, easements, and other means. There is a growing body of knowledge occurring under the general category and discipline of disturbance theory. These efforts could be accessed and included in the planning efforts, particularly those based on long-term considerations where natural unpredictability or inconsistent social commitments may be anticipated.”

Another commonly expressed idea is that to address issues outside of agency control, plans must study, understand, and document outside factors and develop appropriate mitigation strategies.

***Substantive Principle 3: Land management plans could emphasize maintenance and restoration of watershed health, and could protect and enhance America’s water resources.***

- A. Should a new planning rule include standards to address watershed health? If so, what might those look like? Should the Agency be held accountable only for actions and problems on its NFS lands or take into account water availability and quality factors that are outside of the Agency’s control?
- B. What planning or management guidance could the Agency incorporate in the rule to protect and enhance water resources?
- C. One way to approach planning for an NFS unit is to think about the future of the planning area through the context of its watersheds. Do you see benefits and/or drawbacks to a rule requiring land management planning on a watershed basis?
- D. Do you see benefits or drawbacks to a rule requiring adherence to regionally specific Best Management Practices?

### ***Substantive Principle 3A***

The NOI asks whether a new planning rule should include standards to address watershed health, and if so, what the standards should look like. Further, it asks whether the Forest Service should be held accountable only for actions and problems on NFS lands or take into account water availability and quality factors that are outside of the Agency’s control. In response to the last part of the question, respondents generally did not indicate they think the agency should be held accountable for actions or problems outside its control, although one respondent felt the agency could help mitigate and compensate for water quality issues that occur on non-system lands.

As has been the case with many elements of the NOI’s questions, many respondents took a position that the NFS should generally concern itself with what takes place on NFS lands. In this case in particular, several respondents commented that the agency has no responsibility to deal with improving water quality outside of its boundaries. Some respondents felt strongly that the agency should not include standards to address watershed health; one commenter adds that to do so would amount to an unfunded mandate. Several other commenters specify that watershed health is already addressed by other Forest Service criteria, and the Clean Water Act. One respondent challenges the

Forest Service to look to the handbooks/rules/BMPs already in place rather than developing new rules around the topic.

On the other hand, many respondents felt strongly that including watershed standards would contribute to the health of forests. One commenter states that employing watershed standards is required and for the most part already in place, but needs to be made uniform in the planning rule (133.22). Some comments discussed addressing watershed health as a guideline instead of a standard. One commenter provided a list of specific watershed health criteria to evaluate:

(262.8): “Yes the rules should require watershed health to be addressed. The parameters evaluated should include, but not necessarily be limited to, all of the following: connected disturbed area, streambank stability, sediment loading; macroinvertebrate presence and populations, populations of fish and other aquatic life, riffles and pools, water quality, streamflows, soil conditions and erosion in adjacent areas (including uplands), roads and motorized trails crossing streams, miles (or feet) of road in the water influence zone, and effects of livestock grazing. Yes the rules need to take into account impacts beyond the Forest Service’s control. For example, if there are major impacts being caused by actions on private land, the Forest Service should not do anything to make them worse and look to possible ways to mitigate the impacts.”

Several commenters note that the Forest Service has many tools and strategies at its disposal to help assess, protect, and restore watershed conditions (e.g., PACFISH, INFISH, and ACS). One comment states:

(319.29): “The Forest Service has a number of models that have been in place for years that it can look to for guidance, including PACFISH, INFISH, and the Aquatic Conservation Strategy (“ACS”). The ACS contains objectives for watershed health at multiple spatial scales ranging from a large river basin to a small sub-watershed. Its standards and guidelines apply only to federal actions, but require consideration of watershed-scale cumulative effects to the ACS objectives. The Courts have upheld the ACS as a means to ensure viability of at-risk fish species and to meet agency obligations under the ESA.”

### ***Substantive Principle 3B***

The NOI asks what planning or management guidance the Agency could incorporate in the rule to protect and enhance water resources. Commenters provide many specific suggestions again. A key theme among comments is that the agency already has guidance in watershed standards, rules, and requirements, which now need to be effectively integrated into forest planning. Some cited sources of guidance include federal laws, rules, Forest Service handbooks, and BMPs. Conversely, one commenter indicates the Forest Service should develop specific regional standards and guidelines for each Forest Service region (following a model like PACFISH or INFISH). Several other commenters request the development of standards and guidelines for watershed management and protection.

A few commenters feel the agency should be prioritize the protection of individual water rights, and one commenter feels the agency should ensure that water rights “stay on the

NFS lands”. Another commenter asserts the Forest Service does not have water quality or quantity jurisdiction, and should get its guidance from the appropriate state or local jurisdictions. One commenter elaborates and adds the charge to blend watershed and other uses:

192.17: “Look at municipal, local government and state management plans that have responsibility for clean water intermixed with other public uses (like possibly the City of Portland watershed plan). Water protection is important, but it is not the only benefit public lands are managed for. There has to be a balance between all of the different uses, and that requires tradeoffs.”

Several commenters felt that water management guidance should be required and considered in plan and project decision processes, and one commenter cited the NEPA process as a logical place to provide needed guidance. One commenter felt that guidance should accomplish restoration goals and promote cooperation among governments:

149.19: “Guidance should encourage forest restoration that enhances resilience and prioritize watershed-scale diversity in treatment type. Guidance should also include mandated shifts in grazing regimes to reduce livestock impacts on soils and vegetation within watersheds. Partnerships that promote the active participation of concerned parties from all levels of government and from across the public and private sectors is essential to the watershed approach. The diverse sources of aquatic ecosystem impacts will best be brought under control through a combination of cooperative and mandatory measures tailored to the needs in specific watersheds with wholehearted support from watershed stakeholders. A watershed based approach would need to consider the entire watershed, baseline conditions and should tailor the desired conditions based on the current and future health concerns of the watershed. This approach would need to consider the other agencies with authorities over the fish, wildlife, and water resources, in addition to the other land owners and stakeholders with which strong coordination will be required for a more collaborative process understanding of the problems, identify and buy into goals, select priorities, and choose and implement solutions. A framework and guidance would need to be included in the planning rule to make watershed based planning management consistent and encompass the requirements and mandates the Forest Service is responsible for managing. The framework must also consider the authorities and mandates of the State fish and wildlife agencies along with other agency and stakeholder goals within watersheds. In addition, this framework and guidance would need to be specific and clear to provide for the desired future conditions of the health attributed to the entire watershed.”

### ***Substantive Principle 3C***

The NOI asks what benefits and/or drawbacks exist for a rule requiring land management planning on a watershed basis. Most commenters feel that planning on a watershed basis has strong merits. Some feel it allows for easy identification of management units and simplifies water protection decisions.

Several commenters felt that the best approach is the most flexible one, and that requiring watershed-based planning may ignore specific challenges that some managers face. For example, management planning may unnecessarily restrict activities in one part of a

watershed because of problems in another part of the watershed. Some who oppose watershed-based management feel it increases costs and administrative burdens, and can result in impracticable management prescriptions.

Other commenters felt that the watershed is the best possible planning scale because it lends itself to very effective management, although some caution that a minimum and maximum watershed size should apply to ensure manageability. One commenter states:

177.11: “Land management planning on a watershed basis should be incorporated as the primary planning scale. Other scales should be factored into the equation, but the watershed should be the planning unit of choice because it is where the planning effort can be most effective. Otherwise, using arbitrary or rigid planning boundaries, incongruent objectives become prevalent. Each watershed is different, and within each watershed are ‘opportunity areas’ where management takes place. A coordinated approach would yield much greater benefits than the sum of its parts, especially when considering using biological indicators, such as brook trout, as the management tools in determining effectiveness and condition. Planning on the watershed basis makes the best sense to effect ecosystem health and watershed management.”

Several other possible scales of analysis were presented. Several commenters identified the need for landscape-scale planning. One respondent felt that the watershed basis was good, but not as good as ecosystem-based plans. Another commenter felt that the geographic range of species is important, as species cross and do not observe watershed boundaries. One commenter states that on-the-ground management of activities is what protects watersheds, regardless of the management boundary used.

### ***Substantive Principle 3D***

The NOI asks the public to identify benefits or drawbacks to a rule requiring adherence to regionally specific Best Management Practices. In general the responses were similar. Several respondents support the idea of regional (instead of national) BMPs, although many provide the caveat that they would need to be flexible and adaptable in nature. Some commenters feel that BMPs adapted to the most local level of planning would be the most effective.

Some drawbacks to regional BMPs were listed, including use of data and requirements that may not address the ecological, economic, or social needs of a local watershed or sub-watershed, and decisions made by individuals with no knowledge of local ecological, economic, or social conditions. A few respondents wanted to see some national direction to make sure BMPs are strong and effective wherever employed.

***Substantive Principle 4: Plans could provide for the diversity of species and wildlife habitat.***

- A. How should the new rule provide for diversity?
- B. How should the planning rule guide protection of at-risk species of animals and plants and their habitat?
- C. How can the new planning rule account for variables outside of Agency control, including those impacts that are the result of climate change?
- D. Should species diversity provisions in planning look beyond the individual unit to a watershed or landscape scale, and if so, what is a practical and workable way to incorporate a broader perspective?
- E. How could wildlife habitat monitoring be addressed in a planning rule?

***Substantive Principle 4A***

Under Substantive Principle 4, the NOI asked how the new rule should provide for diversity. Many commenters provided general support for the idea of providing and protecting species diversity and wildlife habitat, although some opposed the idea on the basis that it may be a threat to multiple use activities and ideals. One commenter indicated that the agency should ensure the new planning rule follows and clearly articulates the guidance provided on page 5 of the National Forest Management Act. Several commenters ask for clarification of definitions and point out the potential for litigation if terms aren't carefully defined. For example:

139.3: "A new planning rule should carefully address the issue of habitat and/or species diversity. The chosen language should not burden the agency with requirements that it cannot meet. The "species viability" language from the 1982 rule should be avoided. The new rule should result in plans that focus on maintaining diverse habitat over long term while recognizing that the forest resource must be maintaining diverse habitat over the long term while recognizing that the forest resource must be managed to provide long term habitat. Caution should be utilized if standards and/or guidelines are included. In the past, those terms became synonymous; the language should be simple and clearly defined to avoid confusion."

Several commenters provided support/opposition in relation to specific activities on the forest, with grazing being of particular interest in the context of providing for habitat diversity. Several commenters also provided support or opposition for the use of climate change in the planning for species diversity.

Some commenters gave specific ideas for strategies to ensure diversity, including planning for species diversity on a landscape/watershed/unit scale, and the use of improved monitoring and science. A few commenters question the ability of the agency to manage species viability effectively, given that the States maintain much of the responsibility for wildlife management.

***Substantive Principle 4B***

The NOI asked how the planning rule should guide protection of at-risk species of animals and plants and their habitat. Many respondents again asserted the critical role of proper monitoring and studies to ensure protection is possible. Several respondents discuss (and have different opinions on) whether existing laws such as the Endangered Species Act and other federal and state policies/programs are enough to ensure viability.

Some support planning at a landscape scale, others support identifying specific species and habitat and ensuring careful monitoring is carried out and reported. Several comments supporting local analysis, management, and protection activities were provided. As with nearly all other areas of comment on the NOI, respondents both support and oppose the idea of using climate change in the planning for at-risk species. Some respondents feel that minimizing the road system, protecting migration corridors, and protecting land connectivity will best protect species. For example:

392.1 - Preservation and enhancement of wildlife conditions should be paramount. This is especially important in maintain migration corridors and, therefore, must include limiting vehicle travel in sensitive regions, preserving existing roadless areas, and closing some travel routes, both legal and illegal.

Some commenters want the agency to move evaluation away from “management indicator species” and instead use science behind “focal species”.

***Substantive Principle 4C***

The NOI asks how the new planning rule account for variables outside of Agency control, including those impacts that are the result of climate change?

Substantive Principles 2E and 3A covered this topic, which was reiterated in a similar way in this question of the NOI. Several commenters stated that the agency should not account for variables outside of its ability to control. Many commenters identified adaptive management strategies as a solution, and still others indicated that by protecting and monitoring the species and habitats, the agency has done what it can realistically do to account for impacts outside of its control. Some suggest risk management planning around these variables.

Please see discussions under Substantive Principles 2E and 3A for comparison of similar public comments.

***Substantive Principle 4D***

The NOI asks whether species diversity provisions in planning should look beyond the individual unit to a watershed or landscape scale, and if so, what is a practical and workable way to incorporate a broader perspective. Much of this same material was discussed for Principle 3C. Respondents discussed applying diversity provisions at landscape, watershed, and regional scales, and provided both support and opposition for employing a wider or broader perspective. One commenter states:

208.21 - The need for a “broader perspective” with regard to wildlife diversity has not been demonstrated. If it isn’t broke don’t fix it. Indeed, some of these “broader perspective” issues such as “connectivity” are manufactured and marketed by influential Beltway conservation groups and are not scientifically validated.



As with other areas of public comment, several respondents provided indications that existing guidance was sufficient to answer questions about how and where to address species diversity in the planning process.

#### ***Substantive Principle 4E***

The NOI asks how wildlife habitat monitoring could be addressed in a planning rule. Respondents provided literally hundreds of comments identifying the need for much more structured, intensive, on-the-ground wildlife and habitat monitoring. Monitoring was one of the most pervasive themes on the project. Most commenters feel that the agency needs to execute good monitoring in support of any planning and project activities. Numerous opinions were provided in relation to the appropriate scale of monitoring and which species to focus on. One commenter indicated:

346.8 - The new planning rule should also provide for comprehensive monitoring of "focal," "keystone," and "management indicator species" for all flora and fauna. Loss of certain "keystone" and "at-risk" species from forests can lead to loss of forest sustainability and resiliency, and habitat monitoring alone is insufficient to detect these threats.

Some commenters feel it is critical to share scientific data and monitoring results with state agencies and local field offices, as well as landowners and grazing permittees.

#### ***Substantive Principle 5: Plans could foster sustainable NFS lands and their contribution to vibrant rural economies.***

- A. How can the planning rule reflect the interdependency of social, economic, and ecological systems in a way that supports sustainable management of national forests and grasslands?
- B. How can the Agency recognize and incorporate provisions in the planning rule for managing lands for the sustainable delivery of ecosystem services?
- C. How can plans guide units of the NFS in achieving natural resource conservation and restoration goals in a way that is compatible with providing a set of opportunities for goods and services to support vibrant rural and national economies?

#### ***Substantive Principle 5A***

The NOI asks how the planning rule can reflect the interdependency of social, economic, and ecological systems in a way that supports sustainable management of national forests and grasslands. Themes within the sub-questions of Substantive Principle 5 are deeply intermingled. Many respondents expressed support for ecological protection but feel the agency should accommodate resource extraction in a sustainable way.

Many commenters take the position that economic sustainability is protected by a mandate to manage forests under multiple use principles. They contend this should provide for range, commercial, public and private access, and the planning approach should be careful to protect economic situations in local communities. Conversely, others say Forest Service Lands are invaluable to providing clean ecosystems first and foremost,

and the rule should reflect the importance of natural resources first. Some support the idea of preparing cost benefit analyses to weigh the value of natural resource commodities such as wildlife, recreation, clean ecosystems, etc.

Several respondents feel that significant, sustainable economic opportunity can come from non-extractive industries. These commenters feel that turning to green jobs and tourism in rural areas will ultimately provide a replacement to ailing industries and lumber production. Others feel that extraction of forest products is both sustainable and necessary to communities to sustain economic longevity. Many express general support for finding a balance between the three areas (social/ecological/economic) and weighing these options in fair, collaborative, local settings.

Some commenters make objections questioning the clarity of terms like interdependency, ecosystem services, and vibrant economies, which they feel may lead to the potential for litigation.

### ***Substantive Principle 5B***

The NOI asks how the Agency can recognize and incorporate provisions in the planning rule for managing lands for the sustainable delivery of ecosystem services. Many comment on the definition of “ecosystem services”, several wanting a clear and specific definition of the term. Some question whether delivery of ecosystem services is a part of the agency’s statutory mandates, and to what degree it conflicts with multiple-use management mandates. Some commenters want the agency to be careful to leave traditional multiple-use management options open.

Several commenters feel the agency should ensure that “ecosystem services” embraces various public values such as recreation, clean air, biodiversity, water protection, wildlife habitat, scenic landscapes, and resource production (mining, timber, etc). Several commenters are specific in stating that motorized opportunities should be seen a viable “ecosystem service” and land use designations should reflect this by increasing the percentage of multiple use recreation lands available to the public. Some would like to see public recreation promoted to its own substantive principle for management.

Some feel that more study and quantification should be assigned to ecosystem services and incorporated into the rule. One respondent states that the agency should develop a comprehensive list of specific ecosystem services, examples of these services, and a prioritization framework. This respondent feels the agency should also develop guidance for the framework that includes public input and estimation of the economic value of the ecosystem services. Another commenter indicates that by managing toward clear desired future conditions, the agency would be able to accommodate a diverse range of uses while still achieving its management goals.

Many commenters provide timber-specific comments. Some feel that timber harvest activities should be eliminated as an ecosystem service, while others argue that timber management is essential as an ecosystem service. Many of these commenters feel that management of forest vegetation (including timber harvest, grazing, fire, weed treatment, and insect control) leads to healthier forest ecosystems and that these practices should be retained as management tools.

Another strong theme that emerged is economics. Some respondents want the agency to quantify the values of non-extractive or non-commodity ecosystem components (such as clean air or clean water). Many respondents want the Forest Service to emphasize the economic opportunity that exists on NFS lands, with particular focus on the importance of NFS lands on local economies.

### *Substantive Principle 5C*

The NOI asks how plans can guide units of the NFS in achieving natural resource conservation and restoration goals in a way that is compatible with providing a set of opportunities for goods and services to support vibrant rural and national economies. A few respondents express their feeling that current management is working fine, and that any significant change could lead to damaging local economies.

A key theme that emerged centered on discussions about sustainability, with several ideas expressed about what types of activities are sustainable. Several respondents support using the lands for lumber, mining, and other resource extraction, which they feel are sustainable uses supported and mandated clearly by law.

Others identify the growing recreational economics and promote what they consider to be more sustainable ideals in management direction. These respondents discuss hunting, fishing, motorized recreation, mountain biking, and equestrian uses, among others. Some feel that these “sustainable” types of activities should be the focus of future management, and cite extensive analysis on the economic benefits of these activities. Others feel that the Forest Service should allow these non-extractive activities to augment the traditional resource uses (i.e., timber harvest, mining, grazing) on forests.

Some commenters feel the Forest Service should be focusing solely on ecological systems, and that it isn't the Forest Service mission to ensure vibrant local economies. One commenter points out that if forest ecology is poor, the agency's ability contribute to local economies will fail. Disparate views of the agency's roles in terms of multiple use, recreation, extraction, conservation, and preservation were one of the strongest features in the body of public comment.

Virtually all commenters support increased transparency and openness in consultation, coordination, and collaboration activities with private citizens as well as tribal, state, and local representatives. One commenter states that the best way to ensure vibrant local economies are supported is by providing a strong and clearly defined role for local governments in planning and project-level processes.

## **Legal Consistency**

The final area of action coding and analysis is Legal Consistency. In this action area, comments about a variety of legal issues are captured. Respondents often explain why they think that past planning or current planning is inconsistent with any one of numerous laws, regulations, policies, and plans; or they discuss what they feel should be done to ensure the new planning rule is written to be consistent with these laws, regulations, policies, and plans. Several commenters lay out interpretations of the legal frameworks that should be followed in meeting the agency's commission, roles, and responsibilities, and in conducting land and resource management planning. The comments are again so diverse and specific that they don't lend themselves well to brief summary. The common legal themes are addressed below.

### ***Federal Laws/Regs/Rules/Polices General***

Over 50 comments were received in relation to general federal laws, regulations, rules and policies. Many of these were in support or opposition of using the NEPA process for each LRMP. Other respondents provided detailed discussion of their support or opposition to the use of models such as IMPLAN, AMS, and CER to properly analyze effects of the Planning Rule and LRMP efforts. Some respondents identified their desire to see the Heritage Act used as a baseline for fish and wildlife protection across a landscape scale. Many general comments identified laundry-lists of laws to follow, such as MUSYA, the Organic Act, NFMA, and NEPA. One comment was received in relation to the NHPA, indicating the Forest Service should be sure to address Section 106 of the act in the planning regulations.

### ***National Forest Management Act (NFMA)***

Several respondents discuss NFMA requirements in extensive detail. These occur through the data set, often in the context of discussions about substantive and procedural principles of the NOI. Some of the most common themes include diversity requirements, species viability, estimating and disclosing sustained yield harvest, and support or opposition for lumber production from public lands.

### ***Multiple-Use Sustained-Yield Act (MUSYA)***

A very common response was the public's feeling that the Multiple-Use Sustained-Yield Act's mandates are not being addressed in the goals of the NOI or the agency's planning direction. Respondents comment that any restoration or conservation goals must conform to the multiple use mission of the Forest Service. These respondents also contend that Forest Service lands should be managed primarily for multiple-use, sustained-yield harvest and other socioeconomic benefits

### ***Endangered Species Act (ESA)***

A few commenters provided input on the relationship of the planning rule to the Endangered Species Act. One respondent states that ESA standards are high enough and the agency should be careful not to increase or complicate the compliance process. Other respondents feel the rule should be sure to guarantee ESA protection mandates are met.

### ***Wilderness Act***

A few commenters cited the Wilderness Act, generally proposing that areas remaining in RWAs and IRAs should be addressed and either included as wilderness or returned to a designation such as National Protection Areas to ensure for multiple use by the American public. Some felt that all RWAs and IRAs should be included in the Wilderness system.

### ***National Environmental Policy Act (NEPA)***

Like NFMA, comments relating to NEPA compliance were found throughout the dataset. Most often, the discussions centered on the applicability of NEPA to the planning process, with many feeling that NEPA compliance must be accomplished through an EIS level of evaluation. Many respondents want the agency to ensure the NEPA process will apply to land and resource management planning as well as project-level decisions. Other common NEPA comments relate to the value of NEPA in accommodating collaboration, planning, disclosure, and in addressing and analyzing uncertainty or lack of information.

### ***Past Planning Rules (1982/200/2008)***

Over 60 comments were received specific to the past planning rules (although many dozens of other comments touched on the topic). Most of the discussion in this area of commenting deals with the relationship of past planning rules to NFMA, and the “lessons learned” in the past rulemakings that people feel the agency should be keen to observe. Several responses centered on support or preference for specific aspects of different iterations of the planning rule. Some were quick to point out that the 1982 rules have worked well for a long time, as opposed to all later versions of the rules.

### ***Court Decision***

Respondents provided and cited numerous court decisions to base their support for adaptation and implementation of Forest Service management ideas. The comments did not follow any key theme, but are appropriate for individual review.

### ***Tribal Treaties***

Several comments from Tribes were received, typically requesting that the Forest Service follow mandates requiring consultation with Tribes before the implementation of any Planning Rule. Tribes uniformly commented that the agency needs to involve them collaboratively at all appropriate stages of planning and project implementation.

# Appendix A: Demographics

## Demographics

When comments are captured in the content analysis process, certain demographic information is also coded, collected, and entered in the project database. Demographic coding allows managers to form an overall picture of who is submitting comments, where they live, their general affiliation with various organizations or government agencies, and the manner in which they respond. The database can be used to isolate specific combinations of information about public comment. For example, a report can include public comment only from people in Montana or a report can identify specific types of land users such as recreational groups, agricultural organizations, or businesses.

Although demographic information is captured and tracked, it is important to note that the consideration of public comment is not a vote-counting process. Every comment and suggestion has value, whether expressed by one or a thousand respondents. All input is considered, and the analysis team attempts to capture all relevant public concerns in the analysis process. For the Forest Service Planning Rule NOI, 683 responses were received and processed, representing 735 respondents with discrete mailing information and 1056 signatures.

In the tables displayed below, please note that demographic figures are given for number of responses, respondents, and signatures. For the purposes of this analysis, the following definitions apply: “response” refers to a discrete piece of correspondence; “respondent” refers to each individual or organization to whom a mail identification number is assigned (e.g., a single response may represent several organizations without one primary author); and “signature” simply refers to each individual who adds his or her name to a response, endorsing the view of the primary respondent(s).

## Geographic Representation

Geographic representation is tracked for each respondent during the course of content analysis. Letters and emails were received from 44 of the United States. States of residence for each individual signature were tracked for multiple respondent responses.

**Table A1 - Geographic Representation of Response by Country and State/Territory**

Country	State	Number of Respondents	Number of Signatures
United States	Alaska	7	7
	Alabama	3	3
	Arkansas	1	1
	Arizona	11	12
	California	105	115
	Colorado	77	82
	Connecticut	3	3
	District of Columbia	20	68
	Florida	7	7

Country	State	Number of Respondents	Number of Signatures
	Georgia	7	7
	Idaho	41	43
	Iowa	4	4
	Illinois	16	22
	Indiana	5	5
	Kansas	1	1
	Massachusetts	2	2
	Maryland	10	12
	Maine	1	1
	Michigan	6	6
	Minnesota	24	34
	Missouri	4	4
	Mississippi	1	1
	Montana	45	149
	North Carolina	7	7
	New Jersey	4	4
	New Mexico	10	10
	Nevada	8	8
	New York	5	5
	Ohio	5	5
	Oklahoma	1	1
	Oregon	45	69
	Pennsylvania	9	9
	Rhode Island	1	1
	South Carolina	1	1
	South Dakota	6	6
	Tennessee	5	6
	Texas	10	11
	Utah	17	17
	Virginia	9	9
	Vermont	2	2

Country	State	Number of Respondents	Number of Signatures
	Washington	34	35
	Wisconsin	9	37
	West Virginia	6	6
	Wyoming	32	33
	Anonymous/Unknown	108	185
<b>Total</b>		<b>735</b>	<b>1056</b>

## Organizational Affiliation

Responses were received from various organizations and unaffiliated individuals. Organization types were tracked for each letter and email received. Organization Types of each individual signature were tracked for multiple respondent responses.

**Table A2 - Number of Respondents/Signatures by Organizational Affiliation**

Organization Field	Organization Type	Number of Respondents	Number of Signatures
A	Agriculture Industry or Associations (Farm Bureau)	5	5
B	Business (Affected Owner/CEO, Chamber of Commerce)	4	23
C	County Government Agency/Elected Official	42	42
G	Domestic Livestock Industry (including permittees)	4	4
H	Consultants/Legal Representatives	5	6
I	Individual	448	651
J	Civic Group (Kiwanis, Elks, Community Councils)	1	1
K	Special use Permittee	5	5
L	Timber or Wood Products Industry	16	16
M	Mining Industry/Association (Locatable)	9	9
O	Oil, Natural Gas, Coal, or Pipeline Industry	1	1
P	Preservation/Conservation	83	155
Q	American Indian Govt. Agency/Elected official	13	13
QQ	Tribal Non-Governmental Organization/Tribal member	3	3
R	Recreational	15	15
RB	Mechanized Recreation (Bicycling)	2	3
RC	Recreation/Conservation Organization	4	5
RM	Motorized Recreation	30	52
RN	Non-Motorized/Non-Mechanized Recreation	6	6



Organization Field	Organization Type	Number of Respondents	Number of Signatures
S	State Government Agency/Elected Official/Association	15	15
U	Utility Group	4	4
W	Academic	3	3
X	Conservation District	5	5
XX	Regional/Other Governmental Agency	2	2
Y	Other Organization	9	11
Z	Multiple Use or Land Rights Organization	1	1
<b>Total</b>		<b>735</b>	<b>1056</b>

## Response Type

Response types were tracked for each response received on the project. Responses were received in the form of Letters, Form/Letter Generator Plus', and Petitions.

**Table A3 – Number of Responses/Signatures by Response Type**

Response Type #	Response Type	Number of Responses	Number of Signatures
1	Letter	566	764
2	Form or Letter Generator	9	9
3	Form Plus / Letter Generator Plus	106	112
10	Petition	2	171
<b>Total</b>		<b>683</b>	<b>1056</b>

## Delivery Type

Delivery types were tracked for each response received on the project. Responses were received in the form of Email, Fax, and US Mail or Commercial Carrier.

**Table A4 – Number of Responses/Signatures by Delivery Type**

Delivery Type Code	Delivery Type	Number of Responses	Number of Signatures
E	Email	618	797
F	Fax	19	199
M	US Mail or Commercial Carrier	46	60
<b>Total</b>		<b>683</b>	<b>1056</b>

## Appendix B: Organized Response Report

Organized response campaigns represent 97 percent of the total responses received during the public comment period for the proposal (25,472 forms out of 26,155 responses).

### Form Responses

Forms are defined as five or more responses, received separately, but containing identical text. Once a form is identified, a “form master” is entered into the database with all of the content information. All responses with matching text are then linked to this master form within the database with a designated “form number.” If a response does not contain all of the text presented in a given form, it is entered as an individual letter. Duplicate responses from four or fewer respondents are also entered as individual letters.

Forms are designated with a number for the purpose of tracking subsequent submissions. Form numbers are assigned as each “form master” is identified. The following table presents the number of responses, and signatures associated with each form as well as brief content summaries. Nine forms were identified.

**Table B1 – Form Letter Summary**

Form Number	Number of Responses	Description of Form
1	2183	The Forest Service should use sound science and accountability to protect natural resources and adapt to climate change. Rule should reduce impacts of human stressors such as roadbuilding logging, overgrazing, ORV use, and biomass production. Rule needs to provide a way for citizens to challenge bad science, and be able to participate. Process should be fair and open for this rule. Rule should ensure responsible management of roadless areas through formal designation. Proper wildlife standards should be in place to protect threatened and endangered species.
2	922	The new plan should protect lands, water, and wildlife ahead of mining, logging, energy production, and grazing. Plans should be vetted through an EIS and comply with NEPA, NFMA, ESA, CWA, and other federal laws. Appoint a new committee of scientists. Forest restoration only in areas where there is strong scientific evidence of the need and the likelihood they will have the desired results. Play role in tempering climate change, and in providing clean water without damaging important habitat for native species.
3	424	Regulations must require that the viability of all native wildlife and plant populations be assured through forest planning, require plans to contain clear standards which would ensure protection of resources and limit activities that would degrade air, water, soils, wildlife habitat, etc., require national forests to zone areas of each national forest or grassland by what type of activities will be allowed. Address and adapt to climate change, limit logging and road construction. Impacts of every proposed plan must be disclosed in an EIS.
4	18	Strongly recommend that the Forest Service develop an alternative for analysis in the Environmental Impact Statement for rewriting the planning rules that strengthens and clarifies the requirement the Forest Service has to coordinate their decision making process with state and local government. Drafters of the 1982 rule understood this federal/local planning requirement. Section 219.7 of the 1982 rule provided a basis for local government involvement at every stage of the forest planning process. The succeeding versions removed the step-by-step implementation process described so well by the 1982 rules. This elimination has started to cause problems.

Form Number	Number of Responses	Description of Form
		Joint coordinated planning under the 1982 rules was beneficial to the federal agencies (Bureau of Land Management has clearly defined requirements for coordination) and the participating local governments. We strongly urge you to display an alternative in the EIS that spells out precisely how the Forest Service must coordinate. We suggest you use the existing 1982 rules that have worked so well in the past. In addition, the coordination with state and local government section must continue to be separate and distinct from the section describing collaboration with the general public. Numerous federal laws and regulations require the U.S. Forest Service to consider the economic and social impacts on local communities from plans and decisions they make. Any new planning rule should fully reflect these requirements in law and mandate that USFS personnel follow these laws and regulations.
5	20508	As a supported of Defenders of Wildlife I support strong wildlife protection within in the new NFMA planning rule. Maintaining and restoring wildlife diversity is critical to sustaining resilient forest ecosystems and supporting a \$730 Billion recreation industry. Urge you to incorporate provisions from the America's Wildlife Heritage Act currently moving through Congress. New NFMA rule should clearly guide the Forest Service to sustain fish and wildlife populations. New planning rule should provide for comprehensive monitoring of focal fish and wildlife populations.
6	649	The importance of a diverse range of recreation to the public should be emphasized in the planning rule. Please identify the need to emphasize a diverse range of trail-based recreation and identify motorized and non motorized recreation as a key ecosystem service. Planning regs should focus on procedures for developing, amending, and revising land management plans, and should not focus on policies. Concern over the trend away from multiple use management and toward preservation-oriented management, affecting the health and economic well-being of communities. Issue of loss of multiple-use managed lands should be identified as formal planning issue, with at least one alternative oriented toward enhancing multiple-use sustained-yield management.
7	67	With forthcoming impacts of climate change, it is important to remove the stress of logging, burning, mining, pesticides, OHV use, mining, and most roads within National Forests. New standard and guidelines must be enforced, the rule needs to provide for citizen appeals, the rule needs to designate all NF lands as ecologically critical, the rule needs to provide means for citizens to effectively challenge the use of biased or false science, the Forest Service should put a moratorium on all but the most necessary ground-disturbing activities until a new rule is adopted, the rule needs to assure the top priority is survival and recovery of threatened and endangered species, and the rule must provide for a fair and open process.
8	186	Please extend the comment period 120 – 180 days in order for the public to be involved. 60 Days is not enough for a comment period while the majority of the American public was not aware of this planning process.
9	515	Off-highway vehicle enthusiasts concerned about the impact of this rule making on motorized recreation opportunities. Most troubling is the omission of recreation from the NOI. Recreation has many benefits socially and economically. NOI's concept of restoration should include restoration of recreational access. Agency should seek funding for trails in the planning process. It is incumbent to fulfill the mandate of the MUSYA act of 1960. I'm confident with proper management motorized recreation can coexist with resource values such as watershed protection. The planning process should include motorized recreation and use established techniques for trail design, construction, and maintenance.
<b>Total:</b>	<b>25,472</b>	

Table B2 – Responses by State

State	Frm 1	Frm 2	Frm 3	Frm 4	Frm 5	Frm 6	Frm 7	Frm 8	Frm 9
Alaska	2	3	2		61				2
Alabama	10	6	3		70	4	1		6
Arizona	64	10	4	1	505	18		1	20
Arkansas	14	3	5	1	81	20	2		3
California	357	164	58	2	3929	154	1	39	96
Colorado	65	54	37		875	68	1	4	23
Connecticut	32	11	5		270	2			3
Delaware	5	1	3		53				
District of Columbia	8		3		30		1		
Florida	136	30	34		1325	10		1	23
Georgia	36	19	10		248	3			6
Hawaii	11	4			69		1		
Idaho	7	20	4	3	100	24		57	13
Illinois	92	41	20		881	12	5	1	28
Indiana	30	13	4		257	3	15		7
Iowa	22	6	4		131	1			8
Kansas	22	6	2		135	2			4
Kentucky	20	5	3		137	1	2		
Louisiana	10	3			79	2			8
Massachusetts	53	26	9		569	2	10		6
Maine	12	6	2		136				
Maryland	40	16	10		402	3			4
Michigan	50	19	5		485	11	1		30
Minnesota	62	13	5	2	299	39			8
Missouri	36	13	6		237	5	5		11
Mississippi	7		3	1	39				5
Montana	3	53	1	1	79	7		3	5
Nebraska	11	1	1		76	3		1	2
Nevada	16	5	3	1	143	27			14
New Hampshire	13	5			151	9			4
New Jersey	62	17	9		781	7	1	1	19

State	Frm 1	Frm 2	Frm 3	Frm 4	Frm 5	Frm 6	Frm 7	Frm 8	Frm 9
New Mexico	26	17	5	1	272	9		7	7
New York	142	68	30		1588	2	2		17
North Carolina	53	7	7		456	4	1		7
North Dakota	2	2	1		19	2			
Ohio	66	24	8		578	2	5		22
Oklahoma	10	2	4		82	3		1	2
Oregon	58	26	8		497	41		21	17
Pennsylvania	88	30	12		927	5	1	1	16
Rhode Island	4	4			59				
South Carolina	13	4	2		115	3			5
South Dakota	4	3	1	2	27	2			
Tennessee	28	5	5	1	214	3	2		5
Texas	104	39	19		799	12		1	11
Utah	11	17		1	132	22		17	6
Vermont	4	1	2		81				
Virginia	51	20	6		434	3	2		13
Washington	76	41	15		777	45		28	17
West Virginia	4	1	1		64	1	3		1
Wisconsin	40	18	4		324	40	1		11
Wyoming	3	15	6	1	46	4			
APO					1				
International	88	5	28		383				
Anonymous			5			9	4	2	
<b>Total</b>	<b>2,183</b>	<b>922</b>	<b>424</b>	<b>18</b>	<b>20,508</b>	<b>649</b>	<b>67</b>	<b>186</b>	<b>515</b>